

Exhibit 14.19

United States' Motion to Enter Consent Decree,
United States v. Alden Leeds, Inc. et al., Civil Action No. 22-7326 (D.N.J.)

EXHIBIT A-61

Appendix A to OxyChem's Comments in Opposition to Proposed Consent Decree,
United States v. Alden Leeds, Inc., et al., Civil Action No. 2:22-cv-07326 (D.N.J.)

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 NEWARK VICINAGE
- - -

4 OCCIDENTAL CHEMICAL :CASE NO.
CORPORATION :2:18-cv-11273
Plaintiff :
5 :
v. :
6 :
21ST CENTURY FOX :
7 AMERICA, INC., et al. :
Defendants and :
8 Third-Party :
Plaintiffs :
9 :
v. :
10 :
PASSAIC VALLEY SEWERAGE :
11 COMMISSIONERS, et al. :
Third-Party :
12 Defendants. :
13

14 - - -
September 1, 2022
15 - - -

16
17 Oral deposition of THOMAS
18 STILLEY, taken pursuant to notice, was
held at the law offices of BALLARD SPAHR,
19 LLP, 1735 Market Street, 51st Floor,
Philadelphia, Pennsylvania, commencing at
20 9:17 a.m., on the above date, before
Emily Andreasen, a Court Reporter and
21 Notary Public for the Commonwealth of
Pennsylvania.
22

23 - - -
GOLKOW LITIGATION SERVICES
24 877.370.3377 ph| 917.591.5672 fax
deps@golkow.com

1 present on the site?

2 A. Not specifically, no. I do
3 not know, you know, where it was or what
4 form it was.

5 Q. And do you know why
6 Pitt-Consol listed zinc in this section?

7 A. Based on my review of the
8 documents, no. I did not see specific
9 references to zinc in the production.

10 Q. And why are polychlorinated
11 biphenyls or PCBs listed in this section?

12 MR. HAWORTH: Objection.

13 THE WITNESS: My sense is
14 that they were, you know, present
15 on the site because of their use
16 and in heat transfer from what
17 I've been able to gather from the
18 document review.

19 BY MR. STEPHENS:

20 Q. And why was
21 1,1,1-trichloroethane listed on this
22 section?

23 A. From looking at the
24 document, it appears to be listed on

1 page 4198 and it -- based on looking at
2 this document, it looks like it was used
3 in the maintenance shop as a degreaser.

4 Q. Well, we're jumping ahead,
5 but let's talk about that for a moment.

6 In -- so now we're on
7 page 814198. This page deals exclusively
8 with the use of 1,1,1-trichloroethane at
9 the site, correct?

10 A. It -- I don't know if it
11 exclusively deals with it, but it appears
12 to be dealing with the use since that's
13 what they're covering on this page as the
14 selected substance.

15 Q. And it says in Box Number 5
16 a consult brought 650 pounds of
17 1,1,1-trichloroethane onto the site in
18 the year for which they're reporting
19 here; is that accurate?

20 A. That's --

21 MR. HAWORTH: Objection to
22 form.

23 THE WITNESS: That's what
24 the document states.

1 BY MR. STEPHENS:

2 Q. Do you know how that
3 1,1,1-trichloroethane was stored on the
4 Doremus site?

5 A. I do not. Not specifically.

6 Q. I want to look at Section 13
7 on this, disposal of waste containing the
8 selected substance.

9 And the physical state of
10 the substance as a waste is W-02, which
11 corresponds to a liquid waste. And under
12 the quantity of selected substance
13 disposed, it says 550 pounds and then a
14 parenthetical, "Burned in boilers for
15 heat recovery."

16 Did I read that correctly?

17 A. Yes, you did.

18 Q. So Pitt-Consol burned
19 1,1,1-trichloroethane for heat?

20 A. That's what this document
21 appears to state.

22 Q. Do you have any information
23 that would disagree with this document?

24 A. Not that I'm aware of, no.

1 Q. Do you know what happened to
2 the waste ash or residuals after the
3 1,1,1-trichloroethane was burned?

4 A. I don't know what byproducts
5 are created after 1,1,1-trichloroethane
6 burns. I don't know.

7 Q. Let's just move back a
8 little bit to -- back one page to Bates
9 stamp 814197.

10 A. Okay.

11 Q. And this page deals with
12 polychlorinated biphenyls, correct?

13 A. Yes.

14 Q. And its described use on the
15 site is, "2,140 pounds of
16 PCB-contaminated oils present in one of
17 the plant transformers."

18 Did I read that correctly?

19 A. Yes, you did.

20 Q. And so as of 1980,
21 Pitt-Consol had 2,140 pounds of PCBs on
22 the property, correct?

23 MR. HAWORTH: Objection to
24 the form.

CERTIFICATION

I, Emily Andreasen, certify that
the witness was duly sworn by me and that
the deposition is a true and accurate
record of the testimony given by the
witness.



Emily Andreasen

Court Reporter and Notary Public

Dated:

(The foregoing certification of this
transcript does not apply to any
reproduction of the same by any means,
unless under the direct control and/or
supervision of the certifying reporter.)